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VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Adams v. 339-347 East 12th Street Investor, LLC et al.*
Case No. 1:21-cv-06441-AT-SDA

Dear Judge Torres:

We represent defendant 339-347 East 12th Street Investor, LLC ("East 12th") in this case. We write, pursuant to Individual Rule I(C) and with Plaintiff's counsel's consent, to respectfully request an extension of time for the parties to file their joint letter and proposed Case Management Plan, which are presently due by December 2, 2021.


On November 18, 2021, we submitted a letter motion, on consent, requesting an extension of time for East 12th to respond to the Complaint due to our being very recently retained. On November 19, 2021, the Court granted our request and allowed East 12th until December 20, 2021 to respond to the Complaint. At this time, we are still in the process of investigating and evaluating the claims and defenses in this matter in order to respond to the Complaint. We will be in a better position to discuss the anticipated scope and duration of discovery in this case and to prepare a proposed Case Management Plan with Plaintiff's counsel after East 12th has responded to the Complaint. Therefore, the parties respectfully request that the Court extend the deadline to submit a joint letter and proposed Case Management Plan to January 7, 2022.

This request is the first by our firm, on behalf of East 12th, for an extension of time to file the parties' joint letter and proposed Case Management Plan. We appreciate the Court's consideration of this request. Counsel for the parties are available at the Court's convenience should it have any questions.

GRANTED.

SO ORDERED.

Dated: December 1, 2021
New York, New York



ANALISA TORRES
United States District Judge